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Application GRANTED. The conference is hereby adjourned to **October 29, 2024 at 12:15 p.m.**

The time between September 12, 2024 and October 29, 2024 is excluded to permit the ongoing review of discovery, and to allow the parties to discuss a potential pretrial resolution of this case. 18 U.S.C. § 3161(h)(7)(A). The Court finds that the ends of justice served by excluding such time outweigh the best interests of the public and the Defendant in a speedy trial.

The Clerk of Court is directed to terminate ECF No. 23.

September 9, 2024

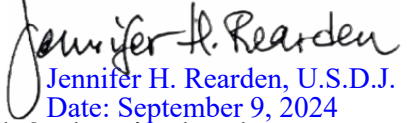
VIA ECF

Hon. Jennifer H. Rearden
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Jorge Perez
24 Cr. 368 (JHR)

Dear Judge Rearden:

SO ORDERED.


Jennifer H. Rearden, U.S.D.J.
Date: September 9, 2024

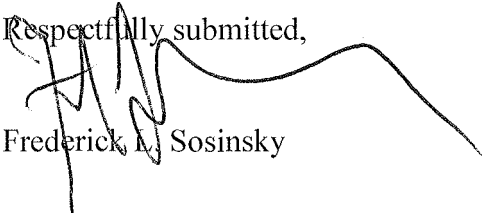
As Your Honor is aware, I represent Jorge Perez, the defendant in the above matter.

I am writing to respectfully request that the status conference presently scheduled for September 12, 2024 at 11:30 am be adjourned for a period of approximately 45 days. I am requesting this adjournment to permit me to conclude my review of the voluminous discovery that has been produced by the government to date, including a production provided in August, and to meet with AUSA Sebastian Swett -- who is preparing to commence a trial next week -- to discuss the most significant of the voluminous discovery and a potential resolution of this matter. AUSA Swett consents to this application. This is the first application for an adjournment of the status conference.

In the event that the Court grants this application, on behalf of Mr. Perez (and as discussed with him), we consent to the exclusion of time under the Speedy Trial Act, 18 U.S.C §3161, from September 12, 2024 through the new date set by the Court for the status conference for the reasons detailed above.

Thank you for your consideration.

Respectfully submitted,


Frederick L. Sosinsky

FLS:bms